REMARKS/ARGUMENTS

1.) Claim Rejections – 35 U.S.C. § 101

The Examiner objected to Claims 17-21 under 35 U.S.C. § 101 because the claims lack the necessary physical articles or objects to constitute a machine or a manufacture within the meaning of 35 USC 101. Applicant respectfully disagrees.

Independent claim 17 clearly recites "a management centre" and "a plurality of target objects" as elements in the claim. The aforementioned elements are used to manage a configuration of a network. As such, independent apparatus claim 17 recites the necessary physical articles or objects to constitute a machine or a manufacture within the meaning of 35 USC 101. Withdrawal of the rejection is respectfully requested.

2.) Claim Rejections – 35 U.S.C. § 102(e)

Claims 12-21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Schroder, *et al.* (US 7,107,329A) (hereinafter, Schroder). Applicant respectfully disagrees.

Schroder discloses a method and system for imperceptibly upgrading router node software and the like without traffic interruption. Schroder discloses the preparation of upgraded software in a router while that router continues to forward data under the control of its original software, and then swapping the upgraded software for the original software without disruption. (Schroder, Abstract)

The Examiner's attention is directed to the fact that Schroder fails to teach, disclose, or suggest "finding a sequence of target routers associated with said target objects that provides continuous connectivity to said management centre", as recited in independent claims 12 and 17. Independent claims 12 and 17 recite:

> 12. A method for managing configuration of a network in a management centre, said network having a plurality of target objects, said method comprising:

elaborating a model of the network to be managed;

identifying a plurality of target objects to be configured in the network;

validating the changes to be made upon configuration of said plurality of target objects; and, if all changes have been validated:

finding a sequence of target routers associated with said target objects that provides continuous connectivity to said management centre; and

configuring each of said target routers. (emphasis added)

17. An apparatus for managing configuration of a network, said apparatus being located in a management centre, said network having a plurality of target objects, said apparatus comprising:

means for elaborating a model of the network to be managed;

means for identifying a plurality of target objects to be configured in the network;

means for validating the changes to be made upon configuration of said plurality of target objects;

means for finding a sequence of target routers associated with said target objects that provides continuous connectivity to said management centre; and

means for configuring each of said target routers. (emphasis added)

The present invention, in one embodiment, discloses managing configuration of a network in a management centre, the network having a plurality of target objects, remarkable in that it comprises: elaborating a model of the network to be managed; identifying a plurality of target objects to be configured in the network; validating the changes to be made upon configuration of the plurality of target objects; and, if all changes have been validated: finding a sequence of target routers that provides continuous connectivity to the management centre; and configuring each of the target routers. Thus, thanks to the present invention, the network administrator can

concentrate on actual network-wide object management instead of complex and time-consuming distributed, per-element implementation.

In contrast, Schroder is related only to operations on a single router and is not concerned with the relation among routers, e.g., the topology of the network. As such, Schroder also fails to teach a management centre as recited in the claims since Schroder is only concerned with forwarding traffic for a single router while that single router receives a software upgrade. The present invention, as recited in independent claims 12 and 17 is concerned, in one embodiment, with the correct configuration **sequence** of target routers in order to maintain continuous connectivity to the management center in a large-scale IP network. In Schroder, no such sequence is taught, disclosed, or suggested.

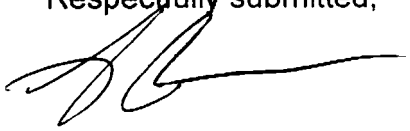
In view of the above arguments, Applicant respectfully asserts that independent claims 12 and 17 are patentable over the cited art. Claims 13-16 and 18-21 are patentable at least by virtue of depending from their respective base claims. Therefore, the allowance of claims 12-21 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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